

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

HOOVER PANEL SYSTEMS, INC.,	§	
	§	
Plaintiff	§	
	§	
v.	§	CIVIL ACTION NO. 3:17-CV-3283-C
	§	
HAT CONTRACT, INC.,	§	
	§	
Defendant.	§	

PLAINTIFF’S RESPONSE
TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff Hoover Panel Systems, Inc. (“Plaintiff” or “Hoover”) files this Response to Defendant HAT Contract, Inc.’s [Second] Motion for Summary Judgment, as follows:

I.

RESPONSE

Defendant’s motion for summary judgment should be denied, as there are genuine disputes of material fact on each element of Plaintiff’s breach of contract claims, trade secrets misappropriation claim, promissory estoppel claim, quantum meruit claim, and unjust enrichment claim. Pursuant to Local Rule 56.4, each of the required matters will be set forth in Plaintiff’s brief.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that Defendant's motion for summary judgment be denied in its entirety.

Respectfully submitted,

LAW FIRM OF SCOTT ORTIZ, P.C.

By: /s/ M. Scott Ortiz
M. Scott Ortiz
Texas State Bar No. 24032806
scott@scottortizlaw.com

1012 Ridge Road
Rockwall, Texas 75087
Telephone: (972) 772-2800
Facsimile: (972) 772-7780

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that the above-referenced document was served upon all counsel of record via the Court's ECF system in accordance with the Federal Rules of Civil Procedure on this 15th day of April 2019 (and via any additional methods noted below).

Kevin T. Schutte
Shapiro Bieging Barber Otteson LLP
5440 LBJ Freeway, Suite 930
Dallas, Texas 75240

/s/ M. Scott Ortiz